

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE  
DIVISION I

STATE OF TENNESSEE

VS.

PERRY AVRAM MARCH

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CASE NO: 2004-D-3133

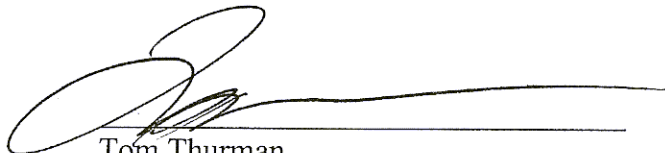
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**STATE'S RESPONSE TO DEFENDANT'S RULE 12(d) REQUEST**

Comes now the State of Tennessee represented by the District Attorney's Office  
for the Twentieth Judicial District and responds to the Rule 12(d) request as follows:

1. The State listed evidence it intends to rely on in its response to discovery.  
(See attached).
2. The State will give notice of any additional evidence as it becomes known  
to the State.

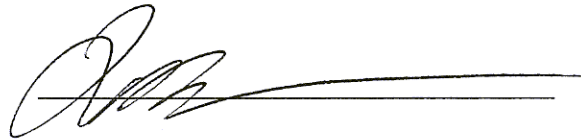
Respectfully submitted,



Tom Thurman  
Tenn.Sup.Ct.Reg.#4738  
Deputy District Attorney General  
Washington Square, Suite 500  
222 Second Avenue North  
Nashville, TN 37201-1649  
(615) 862-5500

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been mailed to John E. Herbison, Attorney at Law, 2016 Eighth Avenue South, Nashville, Tennessee 37204, William D. Massey and Lorna S. McClusky, Attorneys at Law, 3074 East Street, Memphis, Tennessee 38128, on this the 13<sup>TH</sup> day of September, 2005.

A handwritten signature in black ink, consisting of a stylized, cursive name followed by a long horizontal line extending to the right.

Should the defendant testify at trial, the State intends to use the prior criminal record during cross-examination for impeachment and enhancement purposes pursuant to State v. Morgan, 541 S.W.2d 385, Tennessee Rules of Evidence, 609 and 405, and T.C.A. §40-35-202.

3. Tangible objects and documents subject to discovery pursuant to Rule 16(a)(1)(C), Tenn.R.Crim.P., and which the State intends to introduce in its case-in-chief, will be made available for inspection and/or copying upon appointment and are listed as follows: **All evidence will be made available for examination at the police property room and the Office of the District Attorney. All photographs will be available for review and copying**

**(1) Photos**

- (A) Blackberry Road #3**
- (B) Volvo**
- (C) Jeep**
- (D) Bellevue Manor**
- (E) Perry March**

**(2) Videos**

- (A) Depositions**
- (B) Channel 5**
- (C) Channel 4**
- (D) 48 Hrs.**

**(3) Written Statement Perry March**

**(4) 12 day vacation note**

**(5) List**

**(6) Credit card record**

**(7) Letters to Ms. Reames**

**(8) Tire receipt**

**(9) Manuscript**

**(10) Hair**

**(11) Hair sample (Janet March)**

**(12) Fibers**